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"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

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June 5, 2020

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2201
New York, NY 10007

Re: *Ruzhinskaya v. HealthPort Technologies, LLC, et al.*
Case No. 1:14-cv-02921 (PAE) (SDNY)

Dear Judge Engelmayer:

I represent Plaintiff Tatyana Ruzhinskaya and the certified class ("Plaintiffs") in the above matter. Pursuant to Section 4(B) of Your Honor's Individual Rules and Practices in Civil Cases, I am writing to request permission to file Plaintiffs' Memorandum of Law in Opposition to Beth Israel Medical Center's Motion for Summary Judgment under seal. Defendants consent to this request.

An unredacted copy of the Memorandum of Law with the proposed redactions highlighted in yellow is being filed under seal electronically, pursuant to ECF Rules & Instructions, section 6. In the event that the court approves the redactions, Plaintiffs request that the unredacted version of this document be filed and maintained under seal, in accordance with sections 4(B) and 6(B) of Your Honor's Individual Rules and Practices.

Plaintiffs make this request pursuant to the Protective Order in this case (Dkt. #54). Specifically, the Memorandum of Law contains material designated as "Confidential." Paragraph 8 of the Protective Order provides in relevant part that "[a]ll Confidential material or testimony filed with the Court, and all portions of pleadings, motions, or other papers filed with the Court that disclosed Confidential material or testimony, shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court."

In this regard, Plaintiffs seek permission to seal Plaintiffs' Memorandum of Law in Opposition to Beth Israel Medical Center's Motion for Summary Judgment and to redact references to its contents in the publicly filed version.

An unredacted copy of the Plaintiffs' Memorandum of Law has been served on counsel for all other parties. Accordingly, Plaintiffs ask that the Court deem this document timely filed.



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I appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Mathew P. Jasinski

Mathew P. Jasinski

cc: All counsel of record (via ECF)

6/8/2020

Granted.

SO ORDERED.

Paul A. Engelmayer
PAUL A. ENGELMAYER
United States District Judge